

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

KEITH RANIERE, CLARE BRONFMAN,  
ALLISON MACK, KATHY RUSSELL,  
LAUREN SALZMAN, and NANCY SALZMAN,

Defendants.

No. 18-cr-204 (NGG)

**NOTICE OF MOTION TO SEVER**

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, dated January 9, 2019, and the Declaration of Kathleen E. Cassidy, dated January 9, 2019, Defendants Clare Bronfman, Kathy Russell, and Nancy Salzman move this Court, before the Honorable Nicholas G. Garaufis, at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for an Order severing their trial from the trial of Defendants Keith Raniere, Allison Mack, and Lauren Salzman, and for such further relief as the Court may deem proper.

Dated: January 9, 2019  
New York, New York

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